

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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RONALD BIANCHI, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendant.

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:  
:  
: Civil Action No. 17-cv-1263 (CCC) (MF)  
:  
: Motion Return Date: May 21, 2018  
:  
: Oral Argument Requested

**[PROPOSED] ORDER DISMISSING FIRST AMENDED CLASS ACTION COMPLAINT**

**THIS MATTER** having been opened to the Court by Squire Patton Boggs (US) LLP and Tompkins, McGuire, Wachenfeld & Barry LLP, attorneys for Defendant Samsung Electronics America, Inc. (“SEA”), for an Order dismissing, pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, the First Amended Class Action Complaint (ECF 16) (the “First Amended Complaint”) filed in the above-captioned matter, and the Court having considered the papers submitted by the parties, and the arguments of counsel, and for good cause appearing:

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

**ORDERED** that SEA’s Motion to Dismiss be and hereby is **GRANTED**; and it is further

**ORDERED** that all claims in the First Amended Complaint against SEA be and hereby are **DISMISSED WITH PREJUDICE**.

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Hon. Claire C. Cecchi, U.S.D.J.